

1 THE HONORABLE RICARDO S. MARTINEZ
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 OLEG CHURYUMOV,

10 Plaintiff,

11 v.

12 AMAZON CORPORATE LLC; UWAIS
13 KHAN; EDWIN MWANGO; ANDREW
14 BERG; JOE RESUDEK; ROBIN
MENDELSON; JEFF BEZOS; and BETH
GALETTI,

15 Defendants.

No. 2:19-cv-00136-RSM

DEFENDANTS' RESPONSE TO
PLAINTIFF'S THIRD MOTION TO
AMEND COMPLAINT

NOTE FOR MOTION CALENDAR:

Friday, January 10, 2020

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DEFENDANTS' RESPONSE TO THIRD
MOTION TO AMEND COMPLAINT
(No. 2:19-cv-00136-RSM) -i

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1 **DEFENDANTS' RESPONSE TO PLAINTIFF'S THIRD MOTION TO AMEND**
 2 **COMPLAINT**

3 Defendants submit the following Response to Plaintiff Oleg Churyumov's ("Plaintiff")
 4 Third Motion for Leave to Amend and Supplement Complaint ("Third Motion to Amend"),
 5 Dkt. #59.

6 On November 25, 2019, the Court issued an Order granting Plaintiff leave to amend his
 7 Complaint in accordance with its rulings. Dkt. #58 at p. 25 ¶ 6 ("Plaintiff may file an amended
 8 complaint no later than thirty (30) days from the date of this Order."). The Court further held
 9 that "[n]othing in this Order precludes Defendants from moving to dismiss any amended
 10 complaint should they believe such action is warranted and legally supported." *Id.* ¶ 7. Rather
 11 than file an amended complaint, on December 22, 2019, Plaintiff filed a Third Motion to Amend
 12 his Complaint. Dkt. #59.

13 Accordingly, because the Court granted Plaintiff leave to amend his complaint in
 14 accordance with its Order, Defendants do not oppose Plaintiff's Motion to Amend. If the Court
 15 grants the motion, once Plaintiff files the amended complaint, Defendants will file and serve an
 16 appropriate response to the amended complaint within the time permitted by the rules or order of
 17 this Court.

1 DATED: January 6, 2020
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By: s/ Linda D. Walton
3

By: s/ Lindsay J. McAleer
4

Linda D. Walton, WSBA #20604
5

Lindsay J. McAleer, WSBA #49833
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15 Attorneys for Defendants
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17 Amazon Corporate LLC, Uwais Khan, Edwin
18 Mwango, Andrew Berg, Joe Resudek; Robin
19 Mendelson, Jeff Bezos, and Beth Galetti
20

21 DEFENDANTS' RESPONSE TO THIRD MOTION TO
22 AMEND COMPLAINT (No. 2:19-cv-00136-RSM)-2
23

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2020, I caused to be served upon the party below, at the address stated below, via the method of service indicated, a true and correct copy of the foregoing document.

Oleg Churyumov
1037 NE 65th St. #81067
Seattle, WA 98115
Telephone: (917) 514-1426
Email: oleg.churyumov@gmail.com

Via Hand Delivery
 Via U.S. Mail, 1st Class,
Postage Prepaid
 Via Overnight Delivery
 Via Facsimile
 Via CM/ECF
 Via E-Mail

Pro se Plaintiff

Pro se Plaintiff **Via E-Mail**

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED at Seattle, Washington, on January 6, 2020.

s/ Lindsay J. McAleer
Lindsay J. McAleer #49833